



Government of the District of Columbia Advisory Neighborhood Commission 5C

Arboretum | Brentwood | Fort Lincoln | Gateway | Langdon | Woodridge

October 14, 2025

DC Zoning Commission
441 4th Street NW Suite 210S
Washington, DC 20001
(transmittal via zcsubmissions@dc.gov)

ZC 24-11: Supplemental Filing Responding to the OP and DDOT Reports

Chairperson Hood and members of the Zoning Commission,

The Office of Planning's report in Exhibit 55 opens with a cursory dismissal of the extensive community opposition entered into the record by two Advisory Neighborhood Commissions, two civic associations, and at least 19 individual residents. OP acknowledges those concerns, but immediately seeks to "clarify" them in ways that overlook the detailed understanding demonstrated in those community submissions. Ironically, it is OP that reveals a troubling innumeracy and disregard for the very spatial and policy fundamentals that the Office itself is charged with interpreting, while leaving unaddressed the many unresolved questions raised in DDOT's report.

Because both the Applicant and OP appear to be struggling with those fundamentals, the following table is provided to assist the Zoning Commission in accurately contextualizing the proportions of land area, zoning composition, and potential housing capacity within Montana Triangle and the broader Amendment 9815 corridor. All figures are drawn from the case record and publicly available data¹²³⁴⁵.

Estimated housing production capacity is based on the residential densities documented in prior proposals for Montana Triangle, each limited to the 14.6-acre *Schaeffer Assembly* (excluding Lot 816 and Parcel 153-111). The *Potential Homes* column below extrapolates from this density range (approximately 163-247 homes/acre) to illustrate the housing capacity affected by the proposed application.

¹ OpenDataDC parcel lots: https://opendata.dc.gov/datasets/f07d97c6fc9543d5987fa026636661d7_33/

² OpenDataDC tax lots: https://opendata.dc.gov/datasets/14d9f44e81914b0cb9a7c622fe237a94_39/

³ OpenDataDC record lots: https://opendata.dc.gov/datasets/5b0b6b13ef894b8da62e6bd458d907b3_35/

⁴ OpenDataDC zoning boundaries:
https://opendata.dc.gov/datasets/fd7c1d709bca4a9295b6fa5ec7d62446_32/

⁵ OpenDataDC Future Land Use Map:
<https://opendata.dc.gov/apps/bd3de33aed3d46ac94e62ed57c3b6644/explore>

Those benchmarks are illustrated below.



ZC 06-15⁶: 3,400–3,600 homes and 148,121 SF of retail



NEW CITY DC
September 12, 2016

VIEW AT INTERSECTION OF MONTANA AVE & T PLACE

Douglas Development
ANTUNOVICH ASSOCIATES 35

NewCityDC Large Tract Review⁷: 2,380 homes, 338,464 SF of retail, and 177,889 SF of office

⁶ ZC 06-15 IZIS case record: https://app.dcoz.dc.gov/Home/ViewCase?case_id=06-15

⁷ 2016 NewCityDC Large Tract Review:
<https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/>

Geography	Acreage	% of Montana Triangle	Potential Homes	Notes/Sourcing
Montana Triangle (Square 4268)	16.4 ac	100%	2,670 - 4,050	Sum of privately owned land area bounded by New York Ave NE, Montana Ave NE, and Bladensburg Rd NE
Existing PDR-1 Parcels (Lot 816 + Parcel 153-111)	1.8 ac	11%	290 - 445	Lots excluded from OP's MU-5B Map Amendment in ZC 14-16; they remain PDR-1 within the Montana Triangle / Amendment 9815 overlap
Proposed ZC 24-11 Map Amendment	4.8 ac	29%	780 - 1,185 eliminated	As reported in Applicant and OP filings
Total PDR-1 if ZC 24-11 approved	6.6 ac	40%	1,070 - 1,630 eliminated	Union of the preceding two geographies
Remaining MU-5B within PUD site	4.2 ac	25%	685 - 1,040	Portion of 24-11 PUD retaining MU-5B zoning, but effectively off-limits for new construction without a future PUD amendment.
Land newly unavailable for housing production if ZC 24-11 approved	9.0 ac	55%	1460 - 2,220 eliminated	Total PUD area
Residual housing production opportunity	5.6 ac ⁸	34%	910 - 1,380 possible	Remaining land, detached from transit-facilitating frontage and adjacent to over-supplied truck bays and parking areas identified in DDOT's report.
Amendment 9815 area along New York Avenue	~14 ac	—	2,280 - 3,460 at risk	Corridor frontage available for additional PDR-only development if this case establishes a precedent of FLUM non-inconsistency.
All New York Avenue communities	??	—	—	Potentially affected, like the residual 34% of Montana Triangle, by the same corridor-blocking precedent.

⁸ An earlier version of this document erroneously had this figure as 7.4 ac; 5.6 ac is less 1.8 ac existing PDR. We regret the error.

While DC faces a housing crisis, approval of this proposal would erase *at least* 1,460 potential homes for a generation. This would include Affordable set-asides. The Office of Planning's report offers no credible analysis of this impact or of its own recommendation. Instead, it accepts at face value the Applicant's assertion that the PUD offers no additional flexibility or development incentive whatsoever, trivializing the magnitude of this land-use concession and leaving open the question of what public purpose this PUD serves at all.

The Zoning Commission should scrutinize the credibility of this report and the assumptions it relies upon, particularly where they conflict with the Comprehensive Plan's core objective of expanding housing opportunity across all neighborhoods. It is difficult to imagine a clearer case where the Office of Planning's deference to an Applicant has come at the expense of the District's own adopted housing goals.

Thank you for your careful consideration in this matter and for all that you do.

Very respectfully,

A handwritten signature in black ink, appearing to be 'SN', written in a cursive, stylized font.

Commissioner Shawn Nelson
representing ANC 5C on ZC 24-11